



PSEG

Public Service Electric and Gas Company P.O. Box E Hancocks Bridge, New Jersey 08038

Salem Generating Station

December 8, 1982

Mr. R. C. Haynes
Regional Administrator
USNRC
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Haynes:

LICENSE NO. DPR-75
DOCKET NO. 50-311
REPORTABLE OCCURRENCE 82-143/03L

Pursuant to the requirements of Salem Generating Station Unit No. 2, Technical Specifications, Section 6.9.1.9.c, we are submitting Licensee Event Report for Reportable Occurrence 82-143/03L. This report is required within thirty (30) days of the occurrence.

sincerely yours,

E. J. Midura
General Manager -
Salem Operations

RF:ks *JBJ*

CC: Distribution

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The Energy People

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Report Number: 82-143/03L

Report Date: 12-08-82

Occurrence Date: 11-24-82

Facility: Salem Generating Station Unit 2
Public Service Electric & Gas Company
Hancock's Bridge, New Jersey 08038

IDENTIFICATION OF OCCURRENCE:

Missed Surveillance - Reactor Trip Breakers.

This report was initiated by Incident Report 82-485.

CONDITIONS PRIOR TO OCCURRENCE:

Mode 1 - RX Power 82 % - Unit Load 900 MWe.

DESCRIPTION OF OCCURRENCE:

On November 24, 1982, during a review of surveillance testing, the Surveillance Co-ordinator determined that Surveillance Procedure SP(O)4.3.1.1.1 was not completed within 7 days of startup as required by Operating Procedure IOP-3. The surveillance tests the reactor trip and bypass breaker manual trip function; its performance meets the requirements of Technical Specification Surveillance Requirement 4.3.1.1, and was required prior to the reactor startup on November 19, 1982. Since the surveillance was not performed, Limiting Condition for Operation 3.3.1 Action 12 applied.

The breakers had been satisfactorily tested prior to the unit startup on October 12, 1982. Satisfactory automatic operation of the reactor trip breakers had been demonstrated by the performance of Procedures 2PD-18.1.004 and 2PD-18.1.005 on November 17, 1982. No problems with either the trip or bypass breakers have been noted since the tests. Testing of the manual trip feature is not possible during power operation.

APPARENT CAUSE OF OCCURRENCE:

The occurrence resulted from confusion surrounding changes in the surveillance of the reactor trip breakers prior to startup. The surveillance, including both automatic and manual trip operation, had formerly been performed in accordance with Procedures 2PD-18.1.006 and 2PD-18.1.007. Procedures 2PD-18.1.004 and 2PD-18.1.005 were performed monthly while at power to test individual breaker operation.

Operating Procedure IOP-3 was recently implemented to co-ordinate plant startup operations. In order to streamline the performance of surveillance necessary for reactor startup, the manual trip test was separated into Procedure SP(O)4.3.1.1.1; an On-the-Spot Change was made to Operating Procedure IOP-3 to require performance of the test. Breaker automatic trip testing requirements at startup were met by increasing the frequency of performance of Procedures 2PD-18.1.004 and

APPARENT CAUSE OF OCCURRENCE: (cont'd)

2PD-18.1.005 to 7 days, and Procedures 2PD-18.1.006 and 2PD-18.1.007 were no longer used.

The present automatic trip tests were confused with the formerly used comprehensive procedures and were assumed to meet the requirement of Operating Procedure IOP-3 for the performance of Procedure SP(O)4.3.1.1.1. As a result the manual trip tests were not performed.

During investigation of the occurrence it was noted that the cover sheets on Procedures 2PD-18.1.004 and 2PD-18.1.005 stated that the they superseded Procedure SP(O)4.3.1.1.1; the statement pertained to a previous procedure by the same number that had been deleted several years before. Correction of the cover sheet was overlooked during subsequent revisions.

ANALYSIS OF OCCURRENCE:

Operability of the Reactor Trip System insures that a reactor trip will be initiated when a parameter monitored by the system reaches the limiting safety setpoint. The system provides the overall reliability, redundancy and diversity of protective action assumed to be available for the mitigation of accident and transient conditions.

Limiting Condition for Operation 3.3.1 Action 12 requires:

With the number of channels operable one less than the minimum channels operable required, restore the inoperable channel to operable status within 48 hours or be in hot standby within the next 6 hours and/or open the reactor trip breakers.

As noted, breaker automatic trip operation was satisfactorily tested within the specified interval. Testing of the manual trip feature is required on the basis of plant operation and may not be necessary for up to the length of the fuel cycle. Failure to complete the testing on an isolated basis does not of itself involve any increase in the likelihood of inoperability of the feature. As noted, the manual trip feature operated satisfactorily during the previous surveillance, and the reactor trip breaker channels were assumed to be operable.

Compliance with the limiting condition for operation was therefore maintained, and the event involved no risk to the health and safety of the public. The occurrence constituted an inadequacy in the implementation of administrative and procedural controls which threatened to reduce the degree of redundancy provided in a reactor protective system. The event is therefore reportable in accordance with Technical Specification 6.9.1.9c.

CORRECTIVE ACTION:

Personnel involved were reinstructed concerning the recent changes in the procedures for testing the trip breakers. The cover sheets of Procedures 2PD-18.1.004 and 2PD-18.1.005 were changed to eliminate the

CORRECTIVE ACTION: (cont'd)

incorrect statements. No other problems with the administrative and procedural controls involved were evident, and no further action was deemed necessary.

FAILURE DATA:

Not Applicable

Prepared By R. Frahm

H. J. [Signature]
General Manager -
Salem Operations

SORC Meeting No. 82-109